

EXHIBIT F

DAWN H. CURTIS
Smartmatic USA Corp. vs Michael J. Lindell

September 12, 2023

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF MINNESOTA 3 ----- 4 SMARTMATIC USA CORP., 5 SMARTMATIC INTERNATIONAL 6 HOLDING B.V., AND SGO CORPORATION 7 LIMITED, 8 9 Plaintiffs, 10 vs. Case No. 22-cv-0098-WMW-JFD 11 MICHAEL J. LINDELL and 12 MY PILLOW, INC., 13 14 Defendants. 15 16 17 18 19 20 21 22 23 24 25 Video Deposition of DAWN H. CURTIS Tuesday, September 12, 2023 8:57 a.m. Reporter: Barbara J. Carey, RPR Job Number: J10261228</p>	<p>1 I N D E X 2 EXAMINATION OF DAWN H. CURTIS: 3 By Ms. Wrigley - Page 12 4 By Ms. Oliver - Page 345 5 6 EXHIBITS MARKED: 7 Number Description Page 8 Exh. 405 45 9 Printout from MyPillow Website 10 (7 pages) 11 Exh. 406 52 12 Printout from MyPillow Website 13 (41 pages) 14 Exh. 407 58 15 Printout from MyPillow Website 16 (24 pages) 17 Exh. 408 90 18 CONFIDENTIAL/AEO..... 19 P&L Statement 20 Bates DEF030740.000001, et al. 21 22 Exh. 409 96 23 CONFIDENTIAL/AEO..... 24 MyPillow, Inc., Sales By Customer 25 Summary Bates DEF030750.000001, et al. Exh. 410 99 Text Messages Bates DEF080781.000001, et al. Exh. 411 133 Video of the Absolute Proof Documentary Exh. 412 142 2/5/21 Email String Re: Quick Question - Mike's Video - May I Announce on air? (Continued...)</p>
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<p>1 APPEARANCES: 2 3 ATTORNEY FOR PLAINTIFF SMARTMATIC USA CORP., SMARTMATIC 4 INTERNATIONAL HOLDING B.V., AND SGO CORPORATION LIMITED: 5 6 Julie M. Loftus, Esq. 7 Nicole E. Wrigley, Esq. 8 BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP 9 71 South Wacker Drive, Suite 1600 10 Chicago, IL 60606 11 Telephone: (312) 212-4949 12 nwrighley@beneschlaw.com 13 jloftus@beneschlaw.com 14 15 ATTORNEY FOR DEFENDANT MICHAEL J. LINDELL AND MYPILLOW, 16 INC. 17 Amanda K. Oliver, Esq. 18 PARKER DANIELS KIBORT 19 888 Colwell Building 20 123 North Third Street 21 Minneapolis, Minnesota 55401 22 Telephone: (612) 355-4100 23 oliver@parkerdk.com 24 25 ALSO PRESENT: Robert Buchman, Videographer</p>	<p>1 I N D E X (Continued): 2 3 EXHIBITS: 4 NUMBER/DESCRIPTION PAGE 5 Exh. 413 146 6 2/5/21 Email String Re: Vimeo 7 Absolute Proof 2hr Documentary 8 Bates DEF022482.000001 9 10 Exh. 414 149 11 2/5/21 Email String Re: Mike's 12 Documentary on Election Fraud 13 Bates DEF016737, et al. 14 15 Exh. 415 151 16 2/5/21 Email String Re: Mike's 17 Documentary on Election Fraud 18 Bates DEF019495.000001 19 20 Exh. 416 154 21 2/5/21 Email String Re: Mike's 22 Documentary on Election Fraud 23 Bates DEF068429.000001, et al. 24 25 Exh. 417 157 26 2/5/21 Email String Re: Mike's 27 Documentary on Election Fraud 28 Bates DEF025299.000001 29 30 Exh. 418 159 31 2/5/21 Email String Re: Mike Lindell 32 Absolute Proof Documentary 33 Bates DEF018146.000001, et al. 34 35 Exh. 419 161 36 2/5/21 Email String Re: Mike's 37 Documentary on Election Fraud 38 Bates DEF022390.000001 39 40 Exh. 420 162 41 2/5/21 Email String Re: Mike's 42 Documentary on Election Fraud 43 Bates DEF016635.000001 44 45 (Continued...)</p>

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<p style="text-align: right;">Page 241</p> <p>1 approximately 1 minute, 45 seconds. 2 (Whereupon, Exhibit 441 was marked.) 3 (Video Played: 4 STEVE BANNON: "I want to go back to 5 Mike Lindell. 6 So Mike, I just want to put into perspective 7 for our audience. You made this film, Absolute Proof, 8 came out in February, caused a huge -- you know, huge 9 blowup. The media, who was all excited about every one of 10 your moves, every one of your steps. Total crickets; 11 right? All of a sudden, you stopped seeing any articles 12 about this. 13 You and Dominion finally got into this legal 14 situation, right, where they sued you. You've now come 15 out, and instead of either backing down or working out 16 some deal with Dominion or working out some compromise or 17 saying you're sorry, you've now tripled down. You've made 18 another film called Absolute Interference. 19 For our audience, when are you -- when are you 20 going to release this next movie Absolute Interference? 21 MIKE LINDELL: Well, the one part, the one 22 guest was so good that I made an hour show just about him. 23 We're going to release that later in the week. You can 24 see that on lindell-tv.com. Then -- and then, the 25 following week, we'll release out Absolute Interference,</p>	<p style="text-align: right;">Page 243</p> <p>1 Q. And in the appearance or the video, 2 Mr. Lindell mentioned wanting to release 3 Absolute Interference in connection with his social media 4 platform Frank. 5 Did you remember hearing that? 6 A. I know of social media, yeah, Frank. 7 Q. Are you familiar with Frank? 8 A. Somewhat, yes. 9 Q. What is Frank? 10 A. FrankSpeech. 11 Q. Were you aware at the time, in March of 2021, 12 whether Mr. Lindell was appearing on various media outlets 13 to promote or discuss his Absolute Proof series related to 14 election fraud? 15 A. I don't recall that. 16 Q. Do you know if any media outlets were running 17 advertisements at the same time for MyPillow products? 18 A. I don't recall that, either. 19 Q. Do you know whether Mr. Lindell was using his 20 appearance to help sell MyPillow products at the time? 21 A. I don't recall that, either. 22 Q. Around this time, in March of 2021, would 23 Steve Bannon of War Room been promoting or using any 24 promotional codes to help sell MyPillow products? 25 A. Once again, I don't know when War Room</p>
<p style="text-align: right;">Page 242</p> <p>1 and that -- that could be later in the week. We haven't 2 set the exact date on that yet. I kind of want to line 3 that up with my launching my new social media platform 4 which will be Frank. 5 But this -- when you watch this -- and all of 6 you have seen Absolute Proof -- you know, we're just going 7 to keep dropping more and more. It's going to be to the 8 point that the only announcement I'll be able to make is, 9 'Hey, if you work for Dominion and you were part of this 10 crime against humanity, turn yourself in, save yourselves 11 some jail time.' That's all I can say. I mean, I don't 12 know what else to say to these people. 13 STEVE BANNON: Just to make sure we're as 14 specific as possible, in this film Absolute Interference, 15 are you saying you have whistleblower --" (Video stopped.) 16 BY MS. WRIGLEY: 17 Q. Ms. Curtis, had you seen this video or 18 appearance by Mr. Lindell on Steve Bannon's War Room 19 podcast? 20 A. No. 21 Q. Would you have been aware of his appearance in 22 March of 2021? 23 A. No. 24 Q. Are you familiar with Absolute Interference? 25 A. I know it's another video he did.</p>	<p style="text-align: right;">Page 244</p> <p>1 started. 2 Q. Okay. Let's go to back to Exhibit 437, which 3 is one of your texts. I'm going to ask you to turn to 4 page 57. 5 Are you there? 6 A. I am. 7 Q. The text on these pages are on the date 8 March 26th, 2021, which I'll represent was the date of the 9 appearance and the video we just saw from Mr. Lindell 10 being on Steve Bannon's War Room. 11 Do you see that you text Mr. Lindell on that 12 date at 12:09 p.m.? 13 A. I do see that, yes. 14 Q. And the first text that you list -- or the 15 first, sort of, advertiser that you list there is War Room 16 with \$69,200. 17 Do you see that? 18 A. I do. 19 Q. What does that \$69,200 represent? 20 A. The sales brought in using promo code WARROOM. 21 Q. Okay. And if you look, I guess, to the 22 page before on March 25th, do you see that there were also 23 sales for War Room on the prior day? 24 A. Yes. 25 Q. Okay. And then, actually, if you go to the</p>

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<p style="text-align: right;">Page 245</p> <p>1 next page, page 58, you text a report of sales for the</p> <p>2 promo codes used by these entities on March 29th, and</p> <p>3 War Room's listed there as well; correct?</p> <p>4 A. Correct.</p> <p>5 Q. And on March 29th, 2001, the amount for</p> <p>6 War Room is \$536,800.</p> <p>7 Do you see that?</p> <p>8 A. I do, yes.</p> <p>9 Q. You also note, "Week prior, \$316 -- \$316,100."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And what does that \$536,800 represent?</p> <p>13 A. A week of sales.</p> <p>14 Q. And then, for a week of sales of MyPillow</p> <p>15 products on -- for War Room?</p> <p>16 A. Yes.</p> <p>17 Q. And then, if you look at page 59, do you see,</p> <p>18 on March 30th, in your report, War Room's, again, at the</p> <p>19 top with 31 -- a little over \$31,000?</p> <p>20 A. Yes.</p> <p>21 Q. And that's the daily sales?</p> <p>22 A. Yes.</p> <p>23 Q. And then, if you look at your report in the</p> <p>24 text from March 31st, 2021, there's a daily sales of --</p> <p>25 for War Room, \$28,300.</p>	<p style="text-align: right;">Page 247</p> <p>1 the Absolute Proof series on War Room?</p> <p>2 A. I have no idea.</p> <p>3 Q. Okay. And then, do you know whether those</p> <p>4 were sort of typical numbers, either on a weekly or a</p> <p>5 daily basis, in terms of MyPillow sales for Steve Bannon's</p> <p>6 War Room?</p> <p>7 A. Whenever Mike is on promoting MyPillow</p> <p>8 products, those -- yes.</p> <p>9 Q. Okay. And is the same thing true for some of</p> <p>10 the other radio, media, influencers when Mike Lindell</p> <p>11 appears, do sales typically increase?</p> <p>12 A. Because he's talking about the MyPillow</p> <p>13 products, they tend to have a larger spot run rather than</p> <p>14 their 60-second spot.</p> <p>15 Q. And what about when he's on talking about his</p> <p>16 Absolute Proof election fraud documentaries?</p> <p>17 A. I don't see a spike in sales at all.</p> <p>18 Q. Okay. What about for this one that was on</p> <p>19 March 26th, 2021 on War Room?</p> <p>20 A. I don't know. I'd have to look back at text</p> <p>21 messages and look at the numbers.</p> <p>22 Q. Okay. I want to show you another video. This</p> <p>23 one is from the Eric Metaxas Radio Show. This is going to</p> <p>24 be marked Exhibit 442. The video is over 40 minutes long,</p> <p>25 and again, my colleague's going to put the video in. This</p>
<p style="text-align: right;">Page 246</p> <p>1 Do you see that?</p> <p>2 A. I do.</p> <p>3 Q. And then, if you go to page 60, do you see</p> <p>4 there's a text from you to Mr. Lindell on April 1st, 2021,</p> <p>5 and again, War Room is at the top?</p> <p>6 A. Yes.</p> <p>7 Q. War Room is \$34,700.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And on these few days from March 26th through</p> <p>11 April 1st, War Room is at the top of the amount of radio,</p> <p>12 podcast, influencers selling MyPillow products; correct?</p> <p>13 A. He is.</p> <p>14 Q. And then, if you go to page 62, you report</p> <p>15 additional numbers, and War Room is at the top for</p> <p>16 March -- strike that, for April 2nd, 2021 with daily sales</p> <p>17 of \$33,400.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And then, when you go down to the next text on</p> <p>21 that same page, page 62 for April 5th, 2021, War Room's</p> <p>22 got over \$200,000 sales for the week; correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. And do you know around this time</p> <p>25 whether either Mike Lindell or Steve Bannon was promoting</p>	<p style="text-align: right;">Page 248</p> <p>1 is from April 30th, 2021, just a few days after the one we</p> <p>2 saw from Mr. Bannon. It's got an appearance by</p> <p>3 Mike Lindell, and she's going to play from the start until</p> <p>4 about the 2-minute mark.</p> <p>5 MS. OLIVER: I believe that says</p> <p>6 March 30th.</p> <p>7 MS. WRIGLEY: Oh, March 30th. Thank</p> <p>8 you.</p> <p>9 (Whereupon, Exhibit 442 was marked.)</p> <p>10 (Video Played:</p> <p>11 ERIC METAXAS: "Folks, welcome back. I have</p> <p>12 our friend Mike Lindell of mypillow.com, famed of</p> <p>13 mystore.com. Famed. Here he is.</p> <p>14 Mike, you look like you're in an airport</p> <p>15 closet.</p> <p>16 MIKE LINDELL: I am.</p> <p>17 ERIC METAXAS: I only know that because you</p> <p>18 told me.</p> <p>19 Listen, you're all over the place. You're</p> <p>20 doing tremendous things. We're going to talk to you about</p> <p>21 everything, but what's the most important thing right now?</p> <p>22 What is happening in your life?</p> <p>23 MIKE LINDELL: Well, right now we just</p> <p>24 finished -- there's three things. They're all -- they're</p> <p>25 all equally important. The first one is we're coming out</p>